

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	CRIMINAL NO. 18-cr-30078-002
)	
LENA M. PETERSON,)	<u>FILED UNDER SEAL</u>
)	
Defendant.)	

**UNITED STATES OF AMERICA'S
EX PARTE MOTION TO REVOKE BOND**

The United States of America, by Donald S. Boyce, United States Attorney for the Southern District of Illinois, and Ranley R. Killian, Assistant United States Attorney, moves for an order revoking Defendant's bond and remanding her to the custody of the United States Marshal pending a detention hearing in this case, and in support thereof states as follows:

1. On June 19, 2018, Defendant, Lena M. Peterson, was charged with Passing Counterfeit Obligations of the United States, Title 18, United States Code, Section 472.
2. On May 3, 2018, the defendant was released on bond, with pretrial supervision ordered from the original indictment of the defendant. (The superseding indictment made no changes against Peterson, only the middle name of her co-defendant's name was changed.) Upon her release, the defendant reported to the U.S. Probation Office where her conditions of release were reviewed in detail, and she acknowledged an understanding of the conditions.
3. Since being released on bond United State Probation reports that the defendant has had numerous violations of this Court's bond conditions. Specifically the defendant has tested positive or admitted the use of methamphetamine, has failed to participate in inpatient substance

abuse treatment and failed to attend self-help group sessions. Probation also reports that all treatment options have been exhausted and the defendant does not have an appropriate home plan.

4. Due to the increased risks of nonappearance and danger to the community posed by the defendant's violation conduct, continued illicit drug use, and a lack of a viable home plan, it is respectfully recommended that a bond violator's warrant be issued and the defendant's bond be revoked.

WHEREFORE, based on the above, the United States of America moves for the issuance of an arrest warrant and for the temporary detention of the Defendant to permit revocation of the Defendant's conditional release, pursuant to Title 18, United States Code, Section 3148(b).

Respectfully submitted,

DONALD S. BOYCE
United States Attorney

s/ *Ranley R. Killian*

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